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*Attorneys for United States of America*

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 5:18-cv-01633-BLF
	)	
Petitioner,	)	<b>EIGHTH STATUS REPORT</b>
	)	
v.	)	
	)	
FRANCIS BURGA; FRANCIS BURGA AS	)	
THE ADMINISTRATOR OF THE ESTATE	)	
OF MARGELUS BURGA; and	)	
RUSSELL MANSKY,	)	
	)	
	)	
Respondents.	)	

On May 16, 2019, the United States, respondents Francis Burga (in her individual capacity and as the Administrator of the Estate of Margelus Burga) and Russell Mansky, having previously advised the Court that respondents had provided the Internal Revenue Service (IRS) with revised privilege logs and testimony under oath, pursuant to the Court's June 5, 2018 Order (Docket No. 19), further advised that both respondents had made efforts to obtain and produce additional summoned material.

Since the parties' last report on March 17, 2021 (Docket No. 58), Ms. Burga has continued to make efforts to obtain summoned material. As previously indicated, Ms. Burga has requested that Peter Meier send her the outstanding summoned material that is in his possession. So far, Ms. Burga has made more than a dozen productions of documents from Mr. Meier, the most recent of which occurred

1 on July 29, 2021. Mr. Meier has indicated to Ms. Burga's counsel that he will continue producing  
2 records although the productions will continue to be delayed by the current COVID-19 crisis.

3 Despite these productions, the United States contends that much of the summoned information  
4 remains outstanding and on August 25, 2021, the United States sent Ms. Burga's counsel a letter  
5 specifically identifying the summoned information that the United States contends has not yet been  
6 produced – some of which the United States believes should be in her possession and not Mr. Meier's.  
7 The United States asked that Ms. Burga indicate in her response whether she believes she has already  
8 produced the summoned information and if so, at what Bates number. Or, if the summoned information  
9 has not been produced, then whether the missing information exists, if it does exist where it is, what  
10 efforts she has made to procure it, or if she believes it does not exist, why not. Counsel for Ms. Burga is  
11 currently working on a response to the United States' letter.

12 When this response is received, the United States will be able to evaluate whether respondents  
13 have complied with the summonses. Ms. Burga maintains that she has no control over Mr. Meier's  
14 production of documents and continues to contend that she has complied with the summonses and  
15 complied with the Court's Order enforcing the summonses, but nevertheless will continue to produce to  
16 the IRS any documents provided by Mr. Meier.

17 Contemporaneous with this filing, the United States is also filing a Stipulated Dismissal of  
18 Russell Mansky from this action.

1 Dated this 17th day of September, 2021

2 DAVID A. HUBBERT  
3 Acting Assistant Attorney General

4 /s/ Amy Matchison  
5 AMY MATCHISON (CA SBN 217022)  
6 Trial Attorney, Tax Division  
7 United States Department of Justice

8 Dated this 17th day of September, 2021

9 SIDEMAN & BANCROFT LLP

10 By: /s/ Jay R. Weill  
11 Jay R. Weill  
12 Steven M. Katz  
13 Travis W. Thompson  
14 Attorneys for FRANCIS BURGA;  
15 FRANCIS BURGA AS THE  
16 ADMINISTRATOR OF THE ESTATE OF  
17 MARGELUS BURGA

18 Dated this 17th day of September, 2021

19 WOOD LITIGATION

20 By: /s/ Greg Wood  
21 Greg Wood  
22 Attorney for Respondent RUSSELL  
23 MANSKY  
24  
25  
26  
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ECF CERTIFICATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that I obtained concurrence in the filing of this document from the signatories indicated by the conformed signatures (/s/) of Jay R. Weill and Greg Wood.

/s/ Amy Matchison  
AMY MATCHISON  
Trial Attorney, Tax Division  
U.S. Department of Justice